

Edward O.C. Ord, Esq. (SBN 52123)
Ord & Norman
233 Sansome Street, Suite 1111
San Francisco, CA 94104
Telephone: (415) 274-3800
Facsimile: (415) 274-3838

Attorney for Defendants
Charles Hsin and Optech Limited

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

Civil No. 07-4762-PJH

v.

CHARLES CATHCART, SCOTT
CATHCART, YURIJ DEBEVC, a/k/a YURI
DEBEVC, ROBERT NAGY, DERIVUM
CAPITAL (USA), INC., VERIDIA
SOLUTIONS, OPTECH LIMITED,
CHIHHSIU HSIN, a/k/a CHARLES HSIN,
FRANKLIN THOMASON

Defendants.

**STIPULATION PURSUANT TO
LOCAL RULE 6-1 FOR
ENLARGEMENT OF TIME TO FILE
ANSWER TO THE UNITED STATES'
FIRST AMENDED COMPLAINT BY
DEFENDANTS CHARLES HSIN AND
OPTECH LIMITED**

The Plaintiff and Defendants CHARLES HSIN and OPTECH LIMITED, through
counsel, stipulate to extend the time to file the Answer to Plaintiff's First Amended Complaint
from June 2, 2008 to June 30, 2008.

The reasons for this request include:

1. Counsel for Defendants Hsin and Optech Limited has been temporarily retained to seek
an extension to file the Answer but is not fully authorized to proceed in any other
capacity at this time.
2. Due to the complexity of the case, counsel for Defendants Hsin and Optech Limited
anticipates that more time will be needed to prepare the Answer and affirmative

1 defenses and any necessary pre-answering motions that may need to be filed when
2 counsel is authorized to proceed in the case.

3 3. Counsel for Defendants Hsin and Optech requires more time to resolve potential
4 conflict of interest issues and obtain written waivers if such conflict can be waived.

5 IT IS SO STIPULATED

6 Dated: May 30, 2008

Dated: May 30, 2008

7 ORD & NORMAN

8
9 By /s/ Edward O.C. Ord
10 Edward O.C. Ord
11 Attorney for Defendants
Charles Hsin and Optech Limited

By /s/ Allyson B. Baker
Allyson B. Baker
Attorney for Plaintiff
The United States of America

12 T:\Clients\7118\Stip Ext Time to Answer - Hsin Optech.doc
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Joseph P. Russoniello
United States Attorney
Thomas Moore
Assistant United States Attorney
Chief, Tax Division
9th Floor Federal Building
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
Attorney for Plaintiff

Allyson B. Baker
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 7238
Ben Franklin Station
Washington, D.C. 20044
(allyson.b.baker@usdoj.gov)
Attorney for Plaintiff

HUONG T. BAILIE
Special Trial Attorney
160 Spear Street, 9th Floor
San Francisco, California 94105
Attorney for Plaintiff

ERIC L. WEBB
BARTSCH & WEBB
317 Rosecrans Avenue
Manhattan Beach, California 90069
(ewebb@elwlaw.com)
Attorney for Defendant Charles Cathcart

Farley J. Neuman (fneuman@jgn.com)
Tom Prountzos (tpountzos@jgn.com)
Jenkins Goodma Neuman & Hamilton LLP
417 Montgomery Street, 10th Floor
San Francisco, California 94104
Attorneys for Defendant, Robert Nagy

David Bujannoff Porter, Jr. (porter@woodporter.com)
Wood & Porter
333 Sacramento Street
San Francisco, California 94111
Attorney for Defendant Scott Cathcart

I further certify that on May 30, 2008, service of the foregoing was made upon the following by depositing a copy in the United States mail, postage prepaid:

Yuri Debevc (*pro se*)
1483 Burningtree Road
Charleston, SC 29412

/s/ Edward O. Ord
EDWARD O. ORD